



December 5, 1997

VIA FEDERAL EXPRESS

Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

RECEIVED
DEC 8 1997
FEDERAL RESERVE

Re: No. CCD 92-237; In the Matter of Administration of the North American
Numbering Plan, Carrier Identification Codes (CIC's)

Enclosed for filing in the above captioned matter are an original and four
(4) copies of a Petition of TatumTelephone Company for Waiver of the January
1, 1998 Implementation Date for 4-Digit CIC. We trust that the enclosed will be
found in order for filing and grant.

Should you require any further information, or have any questions
regarding this filing, please call my office directly at (719) 594-5800.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Schoonmaker". The signature is fluid and cursive.

Bob Schoonmaker
Vice-President

Enclosures

cc: Service List

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Before the
Federal Communications Commission
Washington, D.C. 20554

8 1997
DOCKET FILE COPY ORIGINAL

In the Matter of)

Administration of the)
North American Numbering Plan,)
Carrier Identification Codes (CICs))

CC Docket No. 92-237

PETITION OF TATUM TELEPHONE COMPANY
FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

GVNW, Inc.
2270 La Montana Way
Colorado Springs, Colorado 80918

Date Submitted: December 8, 1997

TABLE OF CONTENTS

	<u>Page No.</u>
I Introduction	3
II Background	4
III A Waiver of the Commission Rules is Necessary and In the Public Interest	5
IV Conclusion	5

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Washington, D.C. 20554

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PETITION OF TATUM TELEPHONE COMPANY
FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

I. Introduction

Tatum Telephone Company, (hereafter "Tatum") by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests a temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

Paragraph 20 of the Order reads, "First, we determine that LEC end office switches must be upgraded to accept four-digit CICs by January 1, 1998. Second, we

determine that the transition during which use of both three-digit CICs and five-digit CACs may continue will end on June 30, 1998, rather than on January 1, 1998.”

Further, paragraph 24 states, “If we receive a complaint of LEC noncompliance, infeasibility with that deadline will not relieve a defendant LEC of liability under section 208 of the Commission’s rules. A LEC that determines that it will not meet the January 1, 1998 conversion deadline must seek relief from the Commission prior to that date.”

In compliance with the FCC’s Order on Reconsideration, specifically at paragraph 24, Tatum is seeking relief of the FCC’s conversion deadline of January 1, 1998, by this request for wavier. Tatum will identify special circumstances that warrant a deviation from the Order and that a wavier will serve the public interest. Also, Tatum will show good cause that a waiver of the Commission’s Order is necessary and appropriate as well as in the public interest.

II. Background

Tatum became aware of the requirement to upgrade or change its current software generic to accommodate four-digit CIC and seven-digit CAC shortly after the FCC released its April 1997 Order. Upon learning of the Order and the deadline, Tatum contacted Stromberg-Carlson to discuss network configuration options that would satisfy the FCC CIC/CAC requirements, at the same time provide additional and enhanced functions and features. Stromberg-Carlson did not respond in a timely manner and when it responded the price quotes were not acceptable. Tatum turned to Nortel as an alternative. Based on Nortel’s recommendation, Tatum is moving forward with a switch replacement.

Tatum is using a Nortel equipment reseller to secure the Nortel switch equipment. Equipment has been ordered and is currently in the process of being shipped. Tatum will begin the installation of the switches immediately upon delivery. It is Tatum's intent to have the network operational on or before June 30, 1998.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

Tatum serves one exchange, Tatum, which provisions services for approximately 815 access lines, seven payphones and no motel/hotel lines. Currently Tatum is served by a Stromberg-Carlson DCO, with the software generic 17-B.


As discussed above, Tatum is replacing the current switch with a Nortel DMS 10 with the software generic 406.10. The estimated cost of the switch replacement is \$271,000.

Tatum has taken immediate action to begin the process of achieving compliance with the Commission's requirements upon learning of the FCC's requirements and deadline. Tatum will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline.

IV. Conclusion

As demonstrated, the company has taken immediate action to remedy its situation in order to meet with the FCC's timing requirements. Grant of the instant petition will serve the public interest and will allow Tatum to complete its switch replacement by the FCC's required effective date for the permissive period. Tatum submits that the public interest will be better served by a waiver of the December 31, 1997 date and that grant of this petition would be consistent with the policies underlying these rules. Good cause

having been shown, Tatum Telephone Company respectfully requests the Commission
grant the petition.


Robert C. Schoonmaker
Vice President, GVNW Inc./Management

12/5/97
Date

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